

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
JOANNE L. DIAMOND  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577  
5 Joanne\_Diamond@fd.org

6 Attorney for Eric Long  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 ERIC LONG,  
15 Defendant.

Case No. 2:21-cr-00229-GMN-BNW

**MOTION FOR LEAVE TO FILE  
EXHIBIT UNDER SEAL**

16 Undersigned counsel is filing a Reply in Support of Motion to Modify  
17 Conditions of Release. Exhibit C contains sensitive medical information. Defense  
18 counsel believes this information will assist the Court in evaluating the motion.  
19 Because Exhibit C contains private medical information, it should be filed under  
20 seal and remain under seal. Undersigned counsel will serve the sealed Exhibit C  
21 on the government via electronic mail.  
22  
23  
24  
25  
26

1 **CONCLUSION**

2 For the foregoing reasons, undersigned counsel respectfully requests leave  
3 to file under seal Mr. Long's Exhibit C to his Reply in Support of Motion to  
4 Modify Conditions of Release, and requests that the Court maintain it under seal.

5 DATED this 13th of October, 2021.

6  
7 Respectfully submitted,

8 RENE L. VALLADARES  
9 Federal Public Defender

10 By: /s/Joanne L. Diamond

11 JOANNE L. DIAMOND  
12 Assistant Federal Public Defender  
13 Attorney for Eric Long  
14

15 IT IS SO ORDERED.

16 

17  
18 Cam Ferenbach  
19 United States Magistrate Judge

20 DATED 10-14-2021  
21  
22  
23  
24  
25  
26

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on October 13, 2021, she served an electronic copy of the above and foregoing **MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL** by electronic service (ECF) to the person named below:

CHRISTOPHER CHIOU  
Acting United States Attorney  
K. NICHOLAS PORTZ  
Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/ Felicia Darensbourg  
Employee of the Federal Public  
Defender